

FILED

STATE OF MINNESOTA

OCT 20 2016

COUNTY OF CARVER

DISTRICT COURT

CARVER COUNTY COURTS

FIRST JUDICIAL DISTRICT

*Court File Number Not Applicable****In Re Search Warrants Pertaining to
P.R.N. Death Investigation*****RENEWAL OF PROSECUTOR'S
EX PARTE REQUEST TO SEAL SEARCH
WARRANTS PURSUANT TO
MINN. R. CRIM. PRO. 33.04(d)**

PROSECUTOR'S EX PARTE REQUEST

Chief Deputy Carver County Attorney Peter Ivy renews his previous request that search warrants involved in this death investigation, including all applications for search warrant, search warrants, supporting affidavits, inventory and receipts, not be publically filed with the District Court for another six months, and until Monday, April 17, 2017, or when a criminal case may be instituted, whichever occurs first.

Attorney Ivy requests that these warrants and accompanying documents be resealed pursuant to the provisions of Minnesota Rules of Criminal Procedure 33.04(d)(2016), to toll the timing requirements otherwise set forth in Minn. Stat. §626.15 (Execution and Return of Warrant; Time) and Minn. Stat. §626.17 (Return and Inventory).

Minnesota Rule of Criminal Procedure 33.04(d)(2016) provides that an order sealing a search warrant and accompanying documents must be issued granting the prosecutor's request if, based on a statement signed under penalty of perjury pursuant

to Minn. Stat. §358.116, the Court finds reasonable grounds exist to believe that making the search warrant and related documents public at this time may cause the search or a related search to be unsuccessful, create a substantial risk of injury to an innocent person, or severely hamper an ongoing investigation.

More specifically, the reasons for this request to seal the search warrant and accompanying documents are as follows:

1) This is an active homicide investigation regarding a high profile American celebrity, Prince Rogers Nelson, better known as Prince, who died of an opiate overdose.

2) Both the Carver County Sheriff and the United States Drug Enforcement Agency is actively investigating the circumstances surrounding the death of Prince. There are a number of potential witnesses who have yet to be interviewed. Information obtained as a result of this search warrant is not generally known to these potential witnesses or the public at large. This data is important "hold back" information that cannot be released so as to protect the integrity of pending interviews and investigation. The data collected as part of this active and on-going death investigation constitutes *confidential data* as classified by Minn. Stat. §13.82, Subd. 7 (criminal investigative data). In addition, law enforcement continues to seek records, documents and other data from across the United States.

3) Premature disclosure of data contained in this search warrant and the fruits of its search could cause potential suspects to flee; result in potential evidence being altered or destroyed; potentially provide an incentive for collusion of testimony

between potential co-conspirators; give effective notice such that other suspects are on notice of a potential investigation, surveillance or search; may motivate witness tampering schemes; may compromise potential witness statements if media representatives interview witnesses before law enforcement investigators.

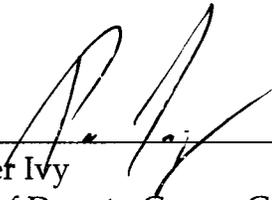
4) Therefore, public filing of these warrants and related documents may create a substantial risk of a search or a related search to become unsuccessful or severely hamper an ongoing investigation.

5) The Honorable Judge Braaten previously issued an order sealing the above-entitled search warrants for six month with the expiration dates listed above. Because this complex, multi-state criminal investigation involving state and federal law enforcement agencies continues, another six-month period of sealing these described warrants is required to preserve the integrity of this complex and confidential investigation.

6) On October 17, 2016, Chief Judge Terrence Conkel issued an order allowing the Carver County Attorney's Office to "opt-out" of the otherwise applicable e-filing requirement set forth in Minnesota Rules of General Practice, Rule 14.01, Subd. B(3), and specifically with respect to those documents pertaining to death of Prince Rogers Nelson.

Pursuant to Minn. Stat. §358.116, I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated this 20 day of October 2016, in Carver County, Minnesota.



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